

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 25-MJ-02526-LOUIS**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.

TOMAS NIEMBRO,  
Defendant.

\_\_\_\_\_ /

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO POST BOND AND FULFILL  
*NEBBIA* CONDITION**

Mr. Tomas Niembro (“Mr. Niembro”), through undersigned counsel, respectfully moves this Court for an extension of time, until the close of business on Monday, April 14, 2025, to post the personal surety bond. In support of this motion, Mr. Niembro states the following:

1. On March 15, 2025, Mr. Niembro was arrested on a criminal complaint alleging Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C. § 1349, and Money Laundering, in violation of 18 U.S.C. § 1956(h). [ECF 3; ECF 4].
2. On March 17, 2025, Mr. Niembro appeared before the Honorable Magistrate Judge Lauren Fleischer Louis for his initial appearance. Judge Louis ordered his release on a \$20 million personal surety bond secured by two properties, and an additional \$2 million bond with 10% down and a Nebbia requirement, among other conditions. [ECF 13].

3. Mr. Niembro was initially given until March 24, 2025, to post the bond. That deadline was previously extended through March 28, 2025, then through April 4, 2025, and again through April 9, 2025. [ECF 13; ECF 16; ECF 20; ECF 22; ECF 26].
4. Mr. Niembro has secured the funds and provided extensive *Nebbia* documentation to the government including bank records, Venezuelan property records, affidavits, share certificates, and wire details.
5. This morning, the Government requested additional information regarding some of those materials, and undersigned counsel is working diligently to obtain and provide it.
6. The funds for the \$2 million bond are currently held in undersigned counsel's trust account and are ready to be deposited.
7. The Assistant U.S. Attorney handling the matter has advised that he does not object to this requested extension.

**WHEREFORE**, Mr. Niembro respectfully requests an extension of time, until the close of business on Monday, April 14, 2025, to post the bond and fulfill the *Nebbia* condition as previously ordered.

Respectfully submitted,

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/s/ Michael B. Nadler

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### **CERTIFICATE OF SERVICE**

I HEREBY certify that on April 9, 2025, I filed the foregoing document with the Clerk of Court via CM/ECF, which will serve all counsel of record through the Notices of Electronic Filing or other authorized means for those not receiving electronic notices.

By: /s/ Juan J. Michelen  
Juan J. Michelen